

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

RALPH S. JANVEY, in his capacity as court-appointed receiver for the Stanford receivership estate; THE OFFICIAL STANFORD INVESTORS COMMITTEE; SANDRA DORRELL; SAMUEL TROICE; and MICHOACAN TRUST; individually and on behalf of a class of all others similarly situated,  
Plaintiff,

V.

GREENBERG TRAURIG, LLP; HUNTON  
& WILLIAMS, LLP; and YOLANDA  
SUAREZ,

Defendants.

Case No. 03:12-CV-4641-N

## RECEIVER'S NOTICE REGARDING MICHOACAN TRUST'S CLAIMS

Plaintiff Ralph S. Janvey, in his capacity as Court-appointed Receiver for the Stanford entities (the “Receiver”), hereby files this Notice Regarding Michoacan Trust’s Claims, respectfully stating as follows:

On February 16, 2009, the Securities and Exchange Commission commenced a lawsuit in this Court against R. Allen Stanford, two associates, James M. Davis and Laura Pendergest-Holt, and three of Mr. Stanford's companies, Stanford International Bank, Ltd. ("SIB"), Stanford Group Company ("SGC"), and Stanford Capital Management, LLC ("SCM") (collectively "Stanford Defendants"). On the same date, the Court signed an Order appointing Ralph S. Janvey as Receiver over all property, assets, and records of the Stanford Defendants, and all entities they own or control. [Case No. 3:09-CV-0298-N, Doc. 10.] Those entities

include Stanford Trust Company, Ltd. of St. Johns, Antigua (“STCL”). The Second Amended Order Appointing Receiver, entered by this Court on July 19, 2010, is identical to the original Order with respect to the Receiver’s appointment described above. [Case No. 3:09-CV-0298-N, Doc. 1130.]

As Receiver for STCL, and as a named Plaintiff in the litigation styled Civil Action No. 3:12-cv-04641-N, *Ralph S. Janvey, et al. v. Greenberg Traurig, et al.*, in the Northern District of Texas, Dallas Division (the “Greenberg Case”), the Receiver has been aware of the fact that Michoacan Trust has filed certain claims against Greenberg Traurig LLP and Hunton & Williams LLP (the “Greenberg Defendants”) since the Greenberg Case was filed in November 2012. The Receiver is the legal representative of STCL, the appointed Trustee of Michoacan Trust under the documents creating the trust. As the Receiver for STCL, the Receiver has not objected, and does not object, to Michoacan Trust pursuing in its own name said claims against the Greenberg Defendants.

Pursuant to Federal Rule of Civil Procedure 17(a)(3), the Receiver hereby ratifies the lawsuit commenced in the name of Michoacan Trust against the Greenberg Defendants, authorizing its continuation and agreeing to be bound by its result. FED. R. CIV. P. 17(a)(3) (“The court may not dismiss an action for failure to prosecute in the name of the real party in interest until, after an objection, a reasonable time has been allowed for the real party in interest to ratify, join, or be substituted into the action. After ratification, joinder, or substitution, the action proceeds as if it had been originally commenced by the real party in interest.”); *Federal Treasury Enter. Sojuzplodoimport v. SPI Spirits, Ltd.*, 726 F.3d 63, 83 (2d Cir. 2013) (“To ratify a suit, the real party in interest must ‘(1) authorize continuation of the action and (2) agree to be bound by its result.’”) (internal citation omitted).

For the reasons set forth above, the lawsuit should proceed as presently captioned with Michoacan Trust pursuing, in its own name, claims against the Greenberg Defendants.

Dated: February 12, 2016

Respectfully submitted,

**NELIGAN FOLEY, LLP**

By: /s/ Douglas J. Buncher

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**COUNSEL FOR THE RECEIVER**

### **CERTIFICATE OF SERVICE**

On February 12, 2016, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. I hereby certify that I will serve all counsel of record electronically or by other means authorized by the Court or the Federal Rules of Civil Procedure.

/s/ Douglas J. Buncher

Douglas J. Buncher